

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

INTEGRITY INVESTMENT FUND,  
LLC, an Illinois limited liability  
company, INTEGRITY INVESTMENT  
REO HOLDINGS, LLC, an Illinois  
limited liability company, SIGTELLO,  
LLC, an Illinois series limited liability  
company, and ABBOTT PORTFOLIO,  
LLC, an Illinois limited liability  
company,

Plaintiffs,

v.

KWAME RAOUL, in his official capacity  
as Attorney General of the State of  
Illinois; DAVID HARRIS, in his official  
capacity as Director of the Illinois  
Department of Revenue; *et al*,

Defendants.

Case No. 3:25-CV-1122-DWD

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL AS TO CERTAIN  
COUNTY DEFENDANTS**

Pursuant to Local Rule 83.1(h), I, Rosa M. Tumialán, move this Court for leave  
to withdraw my appearance for the following parties:

CASS COUNTY, ILLINOIS, an Illinois political subdivision unit of  
government; TRAVIS COX, in his capacity as Treasurer of Cass County, Illinois;  
SHELLY WESSEL, in her capacity as Clerk of Cass County, Illinois;

CHAMPAIGN COUNTY, ILLINOIS, an Illinois political subdivision unit of  
government; BYRON CLARK, in his capacity as Treasurer of Champaign County,  
Illinois; AARON AMMONS, in his capacity as Clerk of Champaign County, Illinois;

CLAY COUNTY, ILLINOIS, an Illinois political subdivision unit of  
government; STACY ALLEN, in her capacity as Treasurer of Clay County, Illinois;  
AMY BRITTON, in her capacity as Clerk of Clay County, Illinois;

CRAWFORD COUNTY, ILLINOIS, an Illinois political subdivision unit of government; RIKKI CALLOWAY, in her capacity as Treasurer of Crawford County, Illinois; BECKIE STALEY, in her capacity as Clerk of Crawford County, Illinois;

HENRY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KELLY VINCENY, in her capacity as Treasurer of Henry County, Illinois; BARBARA M LINK, in her capacity as Clerk of Henry County, Illinois;

KENDALL COUNTY, ILLINOIS, an Illinois political subdivision of unit government; JILL FERKO, in her capacity as Treasurer of Kendall County, Illinois; DEBBIE GILLETTE, in her capacity as Clerk of Kendall County, Illinois;

MONTGOMERY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; NIKKI LOHMAN, in her capacity as Treasurer of Montgomery County, Illinois; SANDY LEITHEISER, in her capacity as Clerk of Montgomery County, Illinois;

MOULTRIE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; STEPHANIE L HELMUTH, in her capacity as Treasurer of Moultrie County, Illinois; LINDA QUALLS-BINDER, in her capacity as Clerk of Moultrie County, Illinois;

STARK COUNTY, ILLINOIS, an Illinois political subdivision unit of government; PAULA LEEZER, in her capacity as Treasurer of Stark County, Illinois; HEATHER HOLLIS, in her capacity as Clerk of Stark County, Illinois;

VERMILION COUNTY, ILLINOIS, an Illinois political subdivision unit of government; DARREN DUNCAN, in his capacity as Treasurer of Vermilion County, Illinois; MATHEW LONG, in his capacity as Clerk of Vermilion County, Illinois;

WHITESIDE COUNTY, an Illinois political subdivision unit of government; PENNY VANKAMPEN, in her capacity as Treasurer of Whiteside County, Illinois; KAREN STAROW, in her capacity as Clerk of Whiteside County, Illinois;

Defendants; HENRY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KELLY VINCENY in her capacity as Treasurer of Henry County, Illinois; BARABRA LINK in her capacity as Clerk of Henry County, Illinois;

Counsel states as follows in support of her motion:

1. I am seeking withdrawal of my appearance for the above referenced parties because substitute counsel, Jason Brokaw with Giffin, Winning, Cohen &

Bodewes, P.C., will be appearing for these parties and will continue to represent them in this matter.

2. I will continue as counsel of record for the county defendants that are not listed above and for whom my appearance was previously filed.

WHEREFORE, the undersigned respectfully requests this Court grant her leave to withdraw as counsel for the above-named parties, and for any such other relief as this Court deems just and proper.

October 29, 2025

Respectfully submitted,

/s/ Rosa M. Tumialán  
Rosa M. Tumialán # 6226267  
(IL), *pro hac vice*  
233 S. Wacker Dr., 61st Floor  
Chicago, IL 60606  
Tel: (312) 627-4191  
Fax: (312) 627-1717  
[rtumialan@tresslerllp.com](mailto:rtumialan@tresslerllp.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the notice of electronic filing.

/s/Rosa M. Tumialán